

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Amendment of Section 73.202(b) ) RM -  
Table of Allotments )  
FM Broadcast Station )  
(Duncan, Arizona) )

To: Chief, Allocations Branch  
Mass Media Division

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**MAR 22 1994**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY**

PETITION FOR RULE MAKING

Duncan Community Radio (hereafter "DCR"), by its attorneys and pursuant to the provisions of Section 1.401 of the Commission's Rules and Section 307(b) of the Communications Act of 1934, as amended, hereby respectfully requests that the FM Table of Assignments be modified as follows:

<u>City</u>	<u>Present</u>	<u>Channel No.</u>	<u>Proposed</u>
Duncan, Arizona	-----		264A

The subject modification in the Table of Assignments can be made without any other alteration therein.

I. BACKGROUND.

1. Duncan, Arizona is a town located in Graham County in the southeastern portion of the state. There is presently no local radio service available to the residents of Duncan. The subject FM allocation would provide a first local aural broadcast

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service to that community.

2. DCR's engineering consultant has ascertained that FM Channel 264A can be assigned to Duncan in full compliance with the minimum spacing requirements of Section 73.207 of the Commission's Rules.<sup>1</sup> See Attachment A hereto. DCR requests that this assignment be adopted by the Commission.

3. In the event the channel is assigned to Duncan, Arizona, DCR, or an applicant affiliated therewith, will file an application seeking to operate an FM station on that allocation.

Wherefore, based on the foregoing, DCR respectfully requests the assignment of Channel 264A to Duncan, Arizona as that community's first FM allocation.

Respectfully submitted,

Duncan Community Radio

By: 

Jeffrey D. Southmayd

Its Attorney

Southmayd & Miller  
1220 Nineteenth Street, N.W.  
Suite 400  
Washington, D.C. 20036  
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Date: March 22, 1994

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<sup>1</sup> 47 C.F.R. 73.207.

**ATTACHMENT A**

# **DECLARATION**

## **ENGINEERING STATEMENT**

Prepared For  
Duncan Community Radio  
Duncan, Arizona

Thomas J. Johnson says that he is an engineer and Vice President of Lechman & Johnson, Inc., Telecommunications Consultants, with offices located at 16201 Trade Zone Avenue, Suite 106, Upper Marlboro, Maryland, and that his qualifications are a matter of record with the Federal Communications Commission.

That the firm of Lechman & Johnson, Inc. has been retained by Duncan Community Radio to prepare this Engineering Statement in support of a Petition for Rule Making to amend the Table of FM Assignments, Section 73.202(b), to allocate Channel 264A to Duncan, Arizona. It is proposed to amend the Table of FM Assignments as follows:

<u>Community</u>	<u>Present Allocation</u>	<u>Proposed Allocation</u>
Duncan, Arizona	-	264A

A channel study was made to determine whether a channel could be found which would comply with the Commission's minimum separation requirements of Section 73.207 of the Rules and Regulations. This study showed that Channel 264A would meet these separation requirements. The reference coordinates relied upon are as follows: 1/

North Latitude: 32° 43' 12"  
West Longitude: 109° 06' 12"

Table I is a list of existing stations, applications, allocations and proposed rule makings of co-channel and adjacent channel assignments pertinent to allocating Channel 264A to Duncan, Arizona. The tabulation of distances shown in this Table were calculated by the methods prescribed in Section 73.208 of the Commission's Rules and Regulations, using the above reference point.

A Class A facility may operate with maximum facilities of 6 kW ERP and antenna HAAT of 100 meters. With these facilities, the predicted distance to the 70 dBu (principal community) contour will extend to a distance of 16.1 kilometers.

1/ These coordinates were obtained from the National Atlas.

LECHMAN & JOHNSON, INC.

Declaration - Duncan, Arizona  
Thomas J. Johnson  
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Section 73.315(a) of the FCC Rules and Regulations requires that the 70 dBu contour must encompass the boundaries of the principal community to be served. There is no terrain obstruction to the city of Duncan. Therefore, the proposed operation will provide the requisite coverage to Duncan, Arizona in accordance with the provisions of Section 73.315(a) & (b) of the FCC Rules and Regulations.

The town of Duncan is located in Greenlee County and has a 1990 population of 663 persons and 1992 estimated population of 739 persons.

Figure 1 is a map which shows the community of license, the reference site and surrounding terrain features.

The results of these studies show that Channel 264A can be assigned to Duncan, Arizona consistent with the requirements of the Commission's Rules and Regulations.

I declare under penalty of perjury that the foregoing is true and correct.

LECHMAN & JOHNSON, INC.



Thomas J. Johnson  
Telecommunications Consultant  
March 18, 1994

TABLE I  
SEPARATION STUDY

Prepared for  
Duncan Community Radio  
Duncan, Arizona

Channel 264A      032-43-12 / 109- 6-12      erp : 6.000 kw      eah : 100 m

Designation =====	Channel (MHz) =====	Pertinent Allocation or Authorized Station =====	Separation Actual =====	(Km) Required =====
Co-channel	264C (100.7)	XHHFM, Ciudad Juare, CH 031-44- 0 / 106-29- 0 0.29 kw / -42 m bearing from proposed = 113.29 deg	270.12 CLEAR (	270 0.12 km)

Note: No other co-channel and/or adjacent channels close enough for consideration.

MARCH 1994

CITY  
GRADE

REFERENCE  
SITE

XHH-PM

FIGURE I

PREPARED FOR  
DUNCAN COMMUNITY RADIO

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